

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

UNITED STATES OF AMERICA) CRIMINAL NO. 4:22-217
) 18 U.S.C. § 2423(c)
) 18 U.S.C. § 2423(e)
v.) 18 U.S.C. § 2423(f)
) 18 U.S.C. § 2428
) 28 U.S.C. § 2461(c)
)
JACK BENSON FLANDERS) INDICTMENT

COUNT ONE

(Engaging in Illicit Sexual Conduct in Foreign Places)

THE GRAND JURY CHARGES:

From on or about March 13, 2014, through on or about July 14, 2017, in Saudi Arabia, and elsewhere, the defendant, **JACK BENSON FLANDERS**, a United States citizen, traveled in foreign commerce, and resided temporarily, in a foreign country, and engaged in, and attempted to engage in, illicit sexual conduct as defined in Title 18, United States Code, Section 2423(f), with a minor female who was under 18 years old when **JACK BENSON FLANDERS** engaged in, and attempted to engage in, illicit sexual conduct with her;

In violation of Title 18, United States Code, Sections 2423(c) and 2423(e).

FORFEITURE

Upon conviction for violation of Title 18, United States Code, Sections 2423(c) and 2423(e), as charged in this Indictment, the defendant, **JACK BENSON FLANDERS**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2428:

- a. any property, real or personal, used or intended to be used to commit or facilitate the commission of the offense; and
- b. any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense.

If any of the property described above, as a result of any act or omission by Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by 18 U.S.C. § 982(b)(1) to seek forfeiture of any other property of Defendant up to an amount equivalent to the value of the above-described forfeitable property;

All pursuant to Title 18, United States Code, Section 2428 and Title 28, United States Code, Section 2461(c).

A True BILL

FOREPERSON /

COREY F. ELLIS
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